

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

**IN RE: TESTOSTERONE REPLACEMENT  
THERAPY PRODUCTS LIABILITY  
LITIGATION**

**CASE NO. 1:14-CV-01748  
MDL 2545**

**JUDGE MATTHEW F. KENNELLY**

**This Document Relates to:**

***Mitchell v. AbbVie,*  
Case No. 1:14-cv-09178**

**STIPULATION**

It is hereby stipulated and agreed between Plaintiff Jesse Mitchell and Defendants Abbott Laboratories and AbbVie Inc. (together, “AbbVie”):

1. All objections on the parties’ respective exhibit lists (as reflected in the “Objection Basis” column of the attached Exhibit A (for AbbVie’s objections) and Exhibit B (for Plaintiff’s objections)) are preserved at this trial. The parties will continue to document their objections to newly proffered exhibits on their exchanged exhibit lists.
2. All objections previously asserted to any exhibit via motion *in limine* (as reflected in the “Objection Code” column of the attached Exhibit A (for AbbVie’s objections) and Exhibit B (for Plaintiff’s objections)) are preserved and need not be re-asserted at this trial.
3. All objections to exhibits, which were overruled, during testimony at previous trials (as reflected in the “Status” column of the attached Exhibit A (for AbbVie’s objections) and Exhibit B (for Plaintiff’s objections)) are preserved and need not be re-asserted at this trial. Although the parties do not intend to re-raise these objections, they reserve their right

to do so with respect to specific exhibits on a limited basis, and will do so in advance of the relevant testimony or during a break in the trial.

4. All documents designated with a “Y” in the “pre-admit” column of the Attached Exhibit A (for documents pre-admitted on Plaintiff’s exhibit list) and Exhibit B (for AbbVie’s exhibit list) will not be subject to an objection by the opposing party at this trial except as permitted in sections 3 and 5.

5. The parties further agree that objections to the cumulative nature of any exhibit under Federal Rule of Evidence 403 or to inadequate expert disclosure under Federal Rule of Civil Procedure 26(a)(2) may be asserted at this trial.

Dated: March 22, 2018

/s/ David M. Bernick

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**CERTIFICATE OF SERVICE**

I, David Bernick, hereby certify that on March 22, 2018, the foregoing document was filed via the Court's CM/ECF system, which will automatically serve and send email notification of such filing to all registered attorneys of record.

/s/ David Bernick

David Bernick